



**Syngenta Seeds**

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Lori Artim

Regulatory Affairs

December 23, 2002

Mr. Leonard Cole

Biopesticides and Pollution Prevention Division

Office of Pesticide Programs

Environmental Protection Agency

Document Processing Desk (EUP)

Room 266A, Crystal Mall 2

1921 Jefferson Davis Highway

Arlington, VA 22202

**Re: Application for Section 3 Registration of the Plant-Incorporated Protectant *Bacillus thuringiensis* VIP3A Insect Control Protein as Expressed in Event COT102 Cotton Plants**

Dear Mr. Cole:

Syngenta has developed a new cotton line that expresses an insect control protein designated VIP3A. VIP3A is one of a novel class of recently discovered insecticidal proteins that occur naturally in *Bacillus thuringiensis* (Bt). The VIPs (vegetative insecticidal proteins) are produced during vegetative bacterial growth.

Syngenta submitted an application to EPA for an Experimental Use Permit (EUP) for this product on September 24, 2002. We look forward to the EPA approving the pending EUP application to allow us to conduct additional efficacy testing and seed generation. At this time, we are submitting an application for a Section 3 registration of VIP3A in cotton. Please find enclosed the following information in support of our application:

- Administrative materials [EPA form 8570-1, EPA form 8570-34, data matrix, label (5 copies), and confidential statement of formula];
- Additional support data; see attached transmittal document.
- Petition for an exemption from the requirement of a tolerance for both the insecticidal protein VIP3A and the inert selectable marker protein APH4.
- Notice of filing.

Syngenta Seeds makes no claims of Confidential Business Information (CBI) for the contents of this letter. Additionally, no specific CBI claims have been made for the accompanying data on the basis of its falling within the scope of FIFRA Section 10(d)(1)(A), (B), or (C). If you have any questions regarding this application, please do not hesitate to contact me.

Sincerely,

Lori Artim  
Regulatory Affairs Manager  
Syngenta Seeds, Inc.

Enclosures

cc: Janet Andersen, BPPD/OPP/EPA  
Phil Hutton, BPPD/OPP/EPA  
Jeff Stein, Syngenta Seeds  
Demetra Vlachos, Syngenta Seeds